

### III. REMARKS

Claims 1-4, 7, 9-12, 14, 16-25, 28-30, 32 and 35-36 are pending in this application. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Examiner, as the present claim amendments and cancellations are only for facilitating expeditious prosecution of the subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, the claims 1-4, 7, 9-12, 14, 16-25, 28-30, 32, 35 and 36 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Tamayo *et al.* (U.S. Patent Pub. No. 2002/0083067), hereafter “Tamayo,” in view of Wu (U.S. Patent Pub. No. 2003/0101442 A1), hereafter “Wu.”

With regard to the 35 U.S.C. §103(a) rejection over Tamayo in view of Wu, Applicants assert that the references cited by the Office fail to teach or suggest each and every feature of the claimed invention. For example, with respect to independent claims 1, 10, 17, 23 and 30, Applicants submit that the references cited by the Office fail to teach or suggest a database table of user predefined data transformations. The Office’s rejection indicates the Office’s position that Tamayo provides predefined data transformations, but does not address the fact that the data transformations are *user* predefined, i.e., predefined by a user. Neither Tamayo nor Wu teaches or suggests this feature. Accordingly, the Office has failed to prove that the cited

references teach or suggest each and every feature of the claimed invention, and Applicants respectfully request that the rejection be withdrawn.

With further respect to independent claims 1, 10, 17, 23 and 30, Applicants submit that the references cited by the Office also fail to teach or suggest that the data transformations in the database table are reusable by a *plurality* of data models. Rather, the Office equates the data transformations of the claimed invention to a code segment of Wu, called a region of reusable instructions, that is located in a single program that is to be optimized. Wu, although indicating that this region of reusable instructions may be reused within the same program that is to be optimized, does not teach or suggest that it is reusable over more than one program. In contrast, the claimed invention includes "...the data transformations in the database table being reusable by a plurality of data models." As such, the region of reusable instructions of Wu does not teach or suggest the reusable data transformations of the claimed invention. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claims 1, 10, 23 and 30, Applicants respectfully submit that Tamayo also fails to teach wherein the database table of predefined data transformations associates each of the predefined data transformations with a unique identifier, a description and a validity period and wherein the developing step comprises retrieving the at least one predefined data transformation from the database table according to its unique identifier. The Office equates the table of user predefined transformations of the claimed invention with the plurality of database tables of Tamayo. The Office then equates elements of the table of the user predefined transformations of the claimed invention with items that may be included in a plurality of data sources. However, the plurality of database tables of Tamayo are completely

different from the plurality of data sources. To this extent, the Office's argument is internally inconsistent. Furthermore, Tamayo only gives a list of items that may be in its plurality of data sources without teaching or suggesting that the items are in any way associated with its algorithms that are used to generate its models. Accordingly, Applicants request that the rejection be withdrawn.

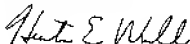
With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

#### **IV. CONCLUSION**

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



Hunter E. Webb

Reg. No.: 54,593

Date: September 25, 2007

Hoffman, Warnick & D'Alessandro LLC  
75 State Street, 14<sup>th</sup> Floor  
Albany, New York 12207  
(518) 449-0044  
(518) 449-0047 (fax)

RAD/hew